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JUL 25 2016

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

MAURICE WILLIAMS

AND ALL OTHERS SIMILARLY SITUATED

REQUESTING JUDGMENT ON CLASS ACTION

(Enter above the full name of the Plaintiff[s]  
in this action.)

*Progressive Insurance Company*  
DAVID KEITH BOWSER and KATIE LADE,

AS INDIVIDUAL ALSO IN THEIR OFFICIAL  
CAPACITIES

(Enter above the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

Case No. \_\_\_\_\_  
(To be assigned by Clerk  
of District Court)

"JURY TRIAL DEMAND"

COMPLAINT

I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

1. DISABILITY ACT 2. R.I.C.O. ACT 3. Title 42 U.S.C. 1981, 1983, 1985  
BREACH OF CONTRACT, MAKING FALSE CLAIMS, DENIAL OF ACCESS TO THE COURT  
DENIAL OF EQUAL RIGHTS UNDER THE LAW, DENIAL OF EQUAL PROTECTION OF  
THE LAW ALL IN VIOLATION OF THE UNITED STATES CONSTITUTIONAL PROVI-  
SIONS First, (1st), Four (4th), Fifth (5th), Six (6th), Eighth (8th), and  
Fourteenth (14th), Amendments, while during Business under color of  
State Statutes and Laws.

II. Plaintiff, Maurice Williams resides at

1320 N. Union Blvd, St.Louis City  
street address city county

Missouri 63113 314-202-9170  
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

IIa. Plaintiffs All Others Similarly Situated,

Address Unknown, St.louis, City/County

Missouri Unknown, Unknown

III. Defendant, David Keith Bowser lives at, or its business is located at

12250 Weber Hill Road, St.louis County  
street address city county

Missouri 65727  
state zip code

(if more than one defendant, provide the same information for each defendant below)

IIII Defendant, Katie Lade, its Business is Located at

12250 Weber Hill Road, St.louis, County  
Street address city county

Missouri, 65727  
state zip code

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

**BACKGROUND STATEMENT OF THE FACTS**

1. Plaintiff, became a member with the **Progressive Insurance Company** on or about 2012 for **several Vehicles throughout the years** despite some Plaintiff believe was overcharges payed his bills on policy number **66606933.**
2. On or about January 27th, 2016, Plaintiff 1998 Lincoln Mark VIII was Stolen, plaintiff made a report to the Police Department and obtained the police report for Progressive Insurance Company. On January 30th, 2016, Plaintiff Added his 2003 Cadillac Deville to his policy and **removed** the above mentioned Stolen 1998 Lincoln, and a 1999 Ford F250, and a 1997 Mercedes Benz **S420** from the above mention policy number 66606933, at first these vehicles that was **removed** was intended for one (1) month or until I relocate my residence because of the number of vehicle breakins, vandalism and thelfs of my cars and trucks. A letter was sent to Progressive Insurance of apology to be placed in my account file with Progressive.
3. Defendant Progressive insurance responded with measures of retaliation for my **removal** of the aboved vehicles mentioned. Those monies was needed for my relocation and moving expenses.
4. Defendant **David K. Bowser**, sent plaintiff a Power of Attorney to obtain Bank statements and Phone records plaintiff signed these forms and plaintiff returned them with all the information that Defendant requested, days later Defendant David Bowser, requested that i obtain these Bank statements and Phone records, plaintiff explained to David Bowser, that he was going through the hardship of pain in his hip and leggs strength to move round asmuch and further his phone records he could not get Defendant Katie Lade, further requested that I bring these records or they would suspend my claim, plaintiff made it clear to these defendant that he had given police his information and there was nothing more he could do or add to the claim that would bring a different result.
5. Defendant, David K. Bowser, terminated the rental car I had retained and Defendant Katie Lade, Suspended my claim. Both Defendants conspired about a month later **worked in the claims Depatment to take monies not ownbd to Progressive Insurance Co.** Plaintiff, bill at this time was only one hundred (\$108) dollar each month for his 2003 Cadillac Deville. Plaintiff made his

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complaint on his account with "WELLS FARGO BANK", that Progressive Casualty Insurance Company had taken an amount not warranted, without notice, or plaintiff's permission. Defendants' made False claims, and in an ongoing act, conspired to close plaintiff's account without notice of giving plaintiff an opportunity to be heard. These retaliatory measures cause harm denying plaintiff the right to insure his cars and trucks particularly plaintiff's 2003 Cadillac Deville and the right to maintain an open account, number 66606933, insuring plaintiff have proper registration for this vehicle. In a continuance act plaintiff was charged with the Rented Car costs and fees'.

6. In ongonig discriminatory act, plaintiff was deprive of rights, privileges, securities and immunities of the law. Defendants denied plaintiff any restitution or a meaningful day in court.
7. Plaintiff spoke over the phone with several Officers, Agents, and Supervisors workers at "Progressive Casualty Insurance Co. requesting grevances, or any other form of redress about the way plaintiff had been unfairly treated and deny plaintiff's legal claim on the 1998 Lincoln Mark VIII, vehicle that was Stolen January 27th, 2016.

Plaintiff, Declare, under the penalty of perjury that the foregoing Background and Statement of Facts, are true and correct, to the best of my knowledge, belief and know how. On this,

25th

, day of July 2016.

*Maurice Williams*

Maurice Williams, Declarant/  
Plaintiff

1. By 42 U.S.C. 1983, Defendants Progressive Casualty Insurance Company is Arthorized to Operate its Business under State Statutes and/or the Color of State Statutes, and 42 U.S.C. 1985, §(2), ane (3), states that;
2. Plaintiff, Maurice Williams, is a Black Afro-American Male a United State Citizen by reasons of Birth and a residence in the City of St.louis, Missouri, § 42 U.S.C.; 1986, provides for damages liability for anyone "who, having knowledge that [a §1985 conspiracy] is about to be committed," does nothing about it;
3. Defendants, David K. Bowser, Katie Lade, and Progressive Casualty Insurance Company, colluded, conspired, to deny plaintiff claims on a 1998, Lincoln Mark VIII, defendants, conspired to terminate, plaintiff Rental vehicle, Breech ~~that~~ contract with plaintiff, Defendants conspired to, deny plaintiff a grievance or complaint, to redress plaintiff's claim, defendant conspired to deny plaintiff, access to the Court, defendants conspired, to go into plaintiff's account and draw monies that was not owed to Progressive Casualty Insurance Company, defendants conspired to have plaintiff pay a Car Rental fee out of his pocket, defendants conspired, to deny plaintiff Equal Rights Under the Law, Defendants conspired to deny plaintiff "due courses of justice" defendants conspired to deprive plaintiff of his claim, defendants conspired, equal privileges, securities and immunities unders the law, defendants conspired to deny to plaintiff the

V. Relief: State briefly and exactly what you want the Court to do for you.

Plaintiff requests the court to issue an Order for an Class action for all others similarly situated against the Progressive Casualty Insurance Company. And if i'm incapacitated or dismissed these complaints and/or relief shall be award to the Daughter Montrice Scott Williams, and carried out the same if I where there, because matter has cause to suffer shock, disbelief grievance and anger, shock to plaintiff's nerve and nervous system, this has cause this plaintiff mental strain and stress, plaintiff would have to get over the shock before he can recover..

~~To Issue an Order paying for the claim of Plaintiff 1998 Lincoln Mark VIII, the costs, Charge of the Rental Vehicle Defendants terminated before plaintiff claim was herld and all other costs and fees attached to this Progressive Insurance Claim for this matter, and all other judgments for the Interest of Justice.~~

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

**Fifty thousands (50,000.00) dollars each Defendants, for conspiring:**

(1) Plaintiff, Maurice Williams, is a **African-American Male** A United States Citizen, by reason of Birth, pursuant to Title 42 U.S.C 1985, Defendants colluded, conspired to deny plaintiff his Insurance claim of His (plaintiff's) stolen 1998 Lincoln Mark VIII, defendants conspired to deny plaintiff his Rental vehicle, Rights Under the Law, Due Process Equal Protection of Law.

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☒

NO ☐

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25 day of JULY, 20 16

*Maurice Williams*  
*Maurice Williams*  
Signature of Plaintiff(s)